

Risk register

Risk Number	Date raised	Opportunity/risk description (opportunities shaded in blue)	Type	Theme	Probability (1 low, 5 high)	Impact (1 low, 5 high)	Level (1 low, 25 high)	Proximity	Strategic	Actions required	Owner
1	10/05/17	Amendments to UK legislation, needed because of GDPR and the LED, are too late to allow the ICO, as regulator, or the regulated sector to adequately plan and prepare for implementation.	External	Policy	4.0	4.0	16.0	Short term	Strategic	Providing support to DCMS to ensure that legislative changes are made. Monitoring passage of the Data Protection Bill.	SLT: Steve Wood
2	05/05/17	That we fail to recruit the right people with the right skills into the most important roles to enable the ICO to prepare for GDPR.	Internal/ External	People	4.0	4.0	16.0	Short term	Strategic	Range of People projects underway intended to mitigate strategic people risks. Progress reported to Change Board, SLT and MB	SLT: Paul Arnold
3	05/05/17	That as the skills of ICO staff are in high demand we see an increase in staff turnover, either organisation wide or in discrete teams or departments, which has a detrimental impact on the capacity and capability of the organisation.	Internal/ External	People	4.0	4.0	16.0	Short term	Strategic	Range of People projects underway intended to mitigate strategic people risks. Progress reported to Change Board, SLT and MB	SLT: Paul Arnold
4	30/06/17	Opportunity to develop the culture of the ICO alongside changes in our processes.	Internal	People	3.0	5.0	15.0	Medium term	Strategic	Range of People projects underway intended to mitigate strategic people risks. Progress reported to Change Board, SLT and MB	SLT: Elizabeth Denham
9	01/04/17	There is an opportunity to shape the DP regime by influencing government and international opinion.	Strategic	Policy	3.0	3.0	9.0	Medium term	Strategic		SLT: Elizabeth Denham
10	01/04/17	Ability of the ICO to spot emerging technological issues and to stay on top of them as they develop	Internal	Policy	3.0	3.0	9.0	Medium term	Strategic	Technology Strategy being developed. Head of Technology Policy recruited and starting in November. Recruitment of Senior Policy Officers - Technology underway.	SLT: Steve Wood
11	01/04/17	Risk of insufficient operations resources to match demand for our services, especially during the relative uncertainty as we transition to a new regulatory regime	Internal	Ops	4.0	3.0	12.0	Medium term	Strategic	Review and refine projections and close monitoring of actual demand.	SLT: James Dipple-Johnstone
12	05/05/17	The ICO may have insufficient funds to meet business needs following the implementation of GDPR.	Internal	Finances	2.0	4.0	8.0	Short term	Strategic	Fee raising power confirmed in Digital Economy Act. Future fees are being discussed with DCMS following a consultation, with a view to fee regulations being laid by the SoS later in the year. Fees to be set to meet ICO business need. Work also commissioned to follow up 100% of expired registrations to maximise size of register prior to transition.	SLT: Paul Arnold

13	10/05/17	The ICO is not seen as being relevant to information rights issues by its stakeholders (the public, media, gov etc) and hence loses influence.	Internal/ External	Reputation	2.0	4.0	8.0	Medium term	Strategic	International Strategy, Parliamentary and Gov Engagement Strategy and Technology Strategy being developed. Information Rights Strategic Plan being bedded in.	SLT: Elizabeth Denham
14	29/06/17	The ICO GDPR change programme is not delivered to time to scope or within budget	Internal	Reputation	2.0	4.0	8.0	Short term	Strategic	Change programme in place mitigating risk on an ongoing basis and overseen by SLT	SLT: Paul Arnold
16	05/05/17	As the ICO's fee income arrangements change our registration service is not equipped to cope and as a result the collection of the ICO's fee income is placed at risk.	Major Project	Finances	2.0	3.0	6.0	Short term	Strategic	We will maintain 100% follow up of data controllers who cease to renew registration and have produced external communications to make clear the need to renew each year. Project team are in the process of developing the processes and technology to implement new fee income collection service based on the future funding model.	SLT: Paul Arnold
18	01/04/17	Cyber defences are not sufficiently robust because the IT environment is not maintained to the required standard, security and integrity	External	IT	2.0	3.0	6.0	Medium term	Strategic	Long standing compliance with PSM combined with regular programme of IT health check/penetration tests . Working towards ISO 27001 compliance.	SLT: Paul Arnold
23	28/06/17	ICO fails to meet expectations when dealing with strategic files in terms of timing and effective outcomes.	Internal/ External	Reputation	2.0	3.0	6.0	Medium term	Strategic	Action underway to provide processes for strategic files. And monthly SLT oversight in place.	SLT: Steve Wood
24	24/07/17	An increasing number of regulators, some with remits related to that of the ICO, results in a lack of clarity and reduced visibility of the ICO's role	External	Reputation	2.0	3.0	6.0	Medium term	Strategic	Communications business plan overseen by Communications Steering Group, plus regular communications strategy meetings with SLT and the Commissioner.	SLT: Elizabeth Denham
25	31/08/17	Poor industrial relations may impair engagement between ICO management and its workforce, leading to sub-optimum productivity and reduced ability to deliver change.	Internal	People	3.0	2.0	6.0	Medium term	Strategic	Regular Joint Committee meetings between TUS and Management.	SLT: Paul Arnold
26	05/05/17	The risk that in-year fee income is not received at a rate necessary to fund our agreed budget. (2017/18)	External	Finances	2.0	2.0	4.0	Short term	Strategic	We follow up 100% of expired registrations and monitor the rate at which fee income is received week to week against previous trends and forecasts. Progress overseen by finance department and standing agenda item at DCEO steering group.	SLT: Paul Arnold
27	05/05/17	That we fail to take the opportunity to lead and support all ICO staff to develop their individual capability and to maximise their personal contribution to our strategic goals and priorities.	Internal	People	2.0	2.0	4.0	Long term	Strategic	Range of People projects underway intended to mitigate strategic people risks. Progress reported to Change Board, SLT and MB	SLT: Paul Arnold
32	05/05/17	That we do not have sufficient space to accommodate our expanding workforce	Internal	People	1.0	2.0	2.0	Medium term	Strategic	Accommodation strategy agreed by SLT in May. A new lease was signed on space adjacent to Wycliffe house which increases Wilmslow accommodation by 20-25%. Continuing to explore ways of best utilising ICO space in general as well as in the new space.	SLT: Paul Arnold